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9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 KATYA ALFONSO,

12 Plaintiff,

13 vs.

14 WILLIAMS & ASSOCIATES d/b/a  
15 WILLIAMS STARBUCK, DONALD H.  
WILLIAMS and DREW J. STARBUCK,

16 Defendants.  
17  
18  
19  
20

Case No.: 2:22-cv-00206-<sup>CDS</sup>~~IAD~~-EJY<sup>1</sup>

**STIPULATION AND ORDER TO  
STAY CASE AND TOLL  
DEADLINES PENDING  
FINALIZATION OF SETTLEMENT**

22 *lll*

23 *lll*

24 *lll*

25 *lll*

26 *lll*

27 *lll*

28 1 Counsel are reminded this case is assigned to Judge Cristina D. Silva. All documents must bear the correct case number 2:22-cv-00206-CDS-EJY. ECF No. 12.

**TO THE HONORABLE COURT AND ALL INTERESTED PARTIES:**

Plaintiff Katya Alfonso (“Plaintiff”) and Defendants Williams & Associates d/b/a Williams Starbuck (“W&A”), Donald H. Williams (“Williams”), and Drew J. Starbuck (“Starbuck”) (collectively as “Defendants”), by and through their attorneys of record, stipulate and request that the stay in this case be continued, and all deadlines tolled, while the parties finalize their settlement.

This stipulation is, and good cause for the relief requested by the stipulation exists, based upon the following facts:

WHEREAS, Plaintiff initiated this action on February 3, 2022;

WHEREAS, Plaintiff filed a First Amended Complaint on February 28, 2022;

WHEREAS, Defendants were served and the parties filed a Stipulation for Extension of Time for Defendants’ responsive pleading, making Defendants’ response to Plaintiff’s First Amended Complaint due March 18, 2022 (ECF No. 8);

WHEREAS, the parties agreed to participate in a private mediation to attempt to resolve this action;

WHEREAS, the parties participated in a private mediation on August 23, 2022, with a third-party neutral mediator, Hon. Elizabeth Gonzalez (Ret.), and through arms length negotiations with the assistance of the mediator, reached an agreement in principle to settle this matter on a class-wide basis.

WHEREAS, the parties are still negotiating the full written settlement agreement and preparing the supporting documents in good faith, including working towards coordinating with a settlement administrator;

WHEREAS, in light of the above, and in no way prejudicing either party’s position, the parties stipulate to stay this action and toll all deadlines to allow the parties additional time to finalize a full written settlement agreement, and for Plaintiff to submit such settlement agreement to the Court along with Plaintiff’s Motion for Preliminary Approval of Class Action Settlement;

1 WHEREAS, the parties agree that there is good cause for this stipulation, as it  
2 is made in good faith and in the interests of justice, and in an effort to conserve the  
3 time and resources of the parties and the Court, and will not prejudice either of the  
4 parties;

5 **IT IS HEREBY STIPULATED AND AGREED, AND THE PARTIES**  
6 **RESPECTFULLY REQUEST THAT** the Court enter an order staying this action  
7 and tolling all deadlines while the parties finalize their settlement agreement until the  
8 Court's ruling on Plaintiff's Motion for Preliminary Approval of Class Action  
9 Settlement.

10 **IT IS SO STIPULATED.**

11  
12 DATED this 18th day of November 2022.

KAZEROUNI LAW GROUP, APC

13  
14 By: s/ Mona Amini

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37 *Attorneys for Defendants*

**ORDER**

**GOOD CAUSE SHOWN, IT IS SO ORDERED.**

**IT IS FURTHER ORDERED** that plaintiff must submit such settlement agreement to the court along with the motion for preliminary approval of class action settlement on or before January 9, 2023, or in the alternative, a status report informing the court of the status of settlement and the motion for preliminary approval of class action settlement.

  
UNITED STATES DISTRICT JUDGE  
DATED: November 22, 2022